

STATE OF SOUTH CAROLINA

(Caption of Case)

192172
BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Annual Review of Base Rates for Fuel Costs
of Carolina Power and Light Company d/b/a
Progress Energy Carolinas, Incorporated

COPY

Posted: lod

DOCKET
NUMBER: 2008 - 1 - E

Dept: S.A.

Date: 4/30/08

(Please type or print)

Submitted by: Michael K. Lavanga Time: 9:45 SC Bar Number: Pro Hac Vice (Order 2008-278)

Address: 1025 Thomas Jefferson St., NW

Telephone: 202-342-0800

Fax: 202-342-0807

Eighth Floor, West

Other: _____

Washington, DC 20007

Email: mkl@bbrslaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: _____

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☒ Electric

☐ Affidavit

☐ Letter

☐ Request

☐ Electric/Gas

☐ Agreement

☐ Memorandum

☐ Request for Certification

☐ Electric/Telecommunications

☐ Answer

☐ Motion

☐ Request for Investigation

☐ Electric/Water

☐ Appellate Review

☐ Objection

☐ Resale Agreement

☐ Electric/Water/Telecom.

☐ Application

☐ Petition

☐ Resale Amendment

☐ Electric/Water/Sewer

☐ Brief

☐ Petition for Reconsideration

☐ Reservation Letter

☐ Gas

☐ Certificate

☐ Petition for Rulemaking

☐ Response

☐ Railroad

☐ Comments

☐ Petition for Rule to Show Cause

☐ Response to Discovery

☐ Sewer

☐ Complaint

☐ Petition to Intervene

☐ Return to Petition

☐ Telecommunications

☐ Consent Order

☐ Petition to Intervene Out of Time

☐ Stipulation

☐ Transportation

☒ Discovery

☐ Prefiled Testimony

☐ Subpoena

☐ Water

☐ Exhibit

☐ Promotion

☐ Tariff

☐ Water/Sewer

☐ Expedited Consideration

☐ Proposed Order

☐ Other: _____

☐ Administrative Matter

☐ Interconnection Agreement

☐ Protest

☐ Other: _____

☐ Interconnection Amendment

☐ Publisher's Affidavit

☐ Late-Filed Exhibit

☐ Report

Print Form

Reset Form

RECEIVED

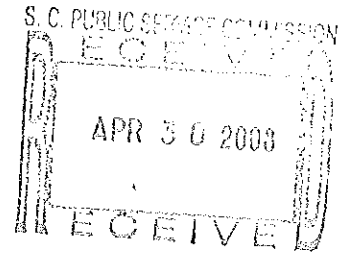
APR 30 2008

PSC SC
DOCKETING DEPT.

BRICKFIELD BURCHETTE
RITTS & STONE, PC

WASHINGTON, D.C.
AUSTIN, TEXAS

April 25, 2008



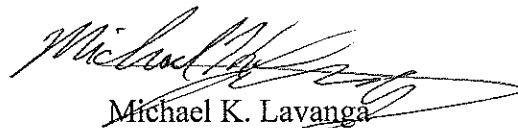
Mr. Charles Terreni
Chief Clerk
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: Annual Review of Base Rates for Fuel Costs of Carolina Power & Light
Company d/b/a Progress Energy Carolinas, Inc.
Docket No. 2008-1-E

Dear Mr. Terreni:

✓ Enclosed for filing is Nucor Steel-South Carolina's First Set of Continuing Data
Requests to PEC in the above referenced matter.

Sincerely,


Michael K. Lavanga

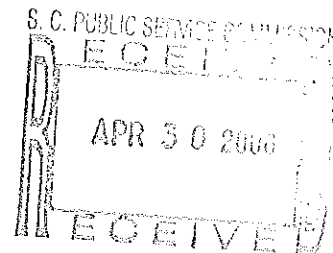
Enclosure

RECEIVED
APR 30 2008
PSC SC
DOCKETING DEPT.

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WASHINGTON, D.C.
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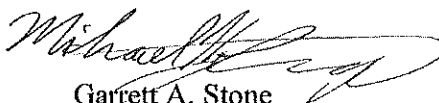
Len S. Anthony, Esq.
Carolina Power and Light Company d/b/a
Progress Energy Carolinas, Inc.
Legal Department – PEB 17A4
Post Office Box 1551
Raleigh, NC 27602

Re: Annual Review of Base Rates for Fuel Costs of Carolina Power & Light
Company d/b/a Progress Energy Carolinas, Inc.
Docket No. 2008-1-E

Dear Len:

I have enclosed Nucor Steel-South Carolina's First Set of Continuing Data
Requests to PEC in the above referenced matter. Please let me know if you have any
questions.

Sincerely,


Garrett A. Stone
Michael K. Lavanga

Enclosure

cc: C. Lessie Hammonds, Esq.
Shealy Boland Reibold, Esq.
Nanette S. Edwards, Esq.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2008-1-E

In the Matter of:)	
)	
Annual Review of Base Rates for Fuel)	NUCOR-STEEL
Costs of Carolina Power & Light)	SOUTH CAROLINA'S
Company d/b/a Progress Energy)	FIRST SET OF
Carolinas, Inc.)	CONTINUING DATA REQUESTS
		TO PEC

Nucor Steel-South Carolina ("Nucor") hereby propounds the following data requests (interrogatories and requests for production of documents) to Progress Energy Carolinas, Inc. ("PEC") and requests that the information and documents requested below be provided within 20 days of receipt of this request by PEC. These requests are continuing in nature and PEC is requested to provide any and all information available as of the date of the response and then complete or update the response as necessary as additional information becomes available.

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if PEC acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, PEC is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. PEC may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by Nucor for the purposes of this proceeding. For each Request, list all assumptions made by PEC in answering said Request.
2. In the event that PEC asserts that any of the information requested is deemed by it to be privileged or proprietary, then PEC in its written response should identify any such data, and any supporting documents, by date and general content. PEC should also identify all persons who participated in the preparation of the document and all persons, inside or outside PEC, who received a copy, read, or examined any such document. In addition, PEC should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS

3. To the extent that PEC asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, PEC, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.
4. In the event PEC asserts that any requested information is not available in the form requested, PEC, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying documents by title);
 - (b) whether it is possible under any circumstances for PEC to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for PEC to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of Nucor may inspect PEC's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom in regulatory proceedings. In the event that PEC asserts that any requested documents are too voluminous, or, for some other reason, copies cannot be provided to Nucor, PEC is requested to make such voluminous or otherwise undeliverable documentary material available for inspection as of the date of the required written responses at such time and place as may be mutually agreed upon among counsel for the parties. PEC is requested to provide notice to Nucor at least two Business Days in advance of the date of the required written responses that it contemplates asserting that any requested documents will be too voluminous to provide Nucor with individual copies, or will otherwise be undeliverable according to PEC. PEC is also requested to provide notice no less than 2 Business Days in advance of the date of required written responses estimating the size and character of any voluminous materials and/or documents, and to provide copying of any noticed materials pursuant to Nucor's designation at Nucor's expense at that time.
6. In providing documents, PEC is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of PEC or any of PEC's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.

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9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document provided. PEC shall provide all responses under oath.
11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2006, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (*e.g.*, models, analyses, databases, formulas) stored by PEC or its consultants in machine-readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Excel file format.
13. To the extent possible, where these Requests seek non-quantitative narrative information (*e.g.*, studies, reports, memorandum, correspondence) stored by PEC or its consultants in machine readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Word format.
14. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with instruction 11; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
15. Nucor requests that PEC send by overnight delivery service (such as Federal Express or a comparable service) one copy of its responses to this Request to each of the following:

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone, P.C.,
1025 Thomas Jefferson Street, NW
Eighth Floor-West Tower
Washington, DC 20007

Thomas S. Mullikin
Robert R. Smith II
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of Nucor's requests is available.

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NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS

DEFINITIONS

1. "PEC" refers to Carolina Power & Light d/b/a Progress Energy Carolinas, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "Nucor" means Nucor Steel-South Carolina.
4. "Historical period" refers to the time period between April 1, 2007 and March 31, 2008.
5. "Forecast period" or "projected period" refers to the time period between April 1, 2008 and June 30, 2009.
6. "Identify" means as follows:
 - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (*i.e.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program

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documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of PEC. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "e.g." or "for example" indicates illustration by example, not limitation.

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QUESTIONS

NUC-1-1 Referring to payments to the federal government related to spent nuclear fuel storage:

- (a) Explain in detail the reasons for the charges by the federal government including how the payments are calculated.
- (b) Provide the amount of such payments by PEC by year since the charges began through March 2008 and indicate the South Carolina share of such payments. Provide the same information on a projected basis for April 2008 through June 2009.
- (c) Are PEC's payments passed through to consumers through the fuel charge?
- (d) Identify the amount of such payments passed through to SC customers during the historical period and projected to be passed through during the projected period.
- (e) Identify and explain in detail the status of PEC's federal lawsuit against the U.S. Department of Energy regarding this issue as well as describing any related or ongoing recovery efforts, including, but not limited to: (i) the amount of damages requested, (ii) the amount of damages PEC expects to receive, including any conceded by DOE, and (iii) the likelihood and expected timing of settlement or completion of the litigation and the expected result.
- (f) Explain how PEC's suit and the likely results compare with recent suits and settlements by other utilities.
- (g) Has PEC included any recovery from DOE as a cost offset in its actual or projected fuel costs for this case?
- (h) Explain in detail the answer to (g) above, including why or why not, and if included, the amount.
- (i) Please identify and explain in detail whether and how any awarded or settled damages related to the PEC's federal lawsuit, if any, will be included as an offset to the calculated recoverable fuel costs for the historical period or forecasted period in this case.
- (j) If PEC does not anticipate including any existing or potentially recoverable damages as an offset in its aggregate fuel cost calculations, please provide a narrative summary explaining how PEC plans on treating for ratemaking purposes the existing or potential recoverable damages related to the federal lawsuit against the DOE.
- (k) Identify and provide related documents.

NUC-1-2 For each set of fuel contract negotiations with any supplier or potential supplier conducted by PEC since April 1, 2007:

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- (a) Identify and provide a list of each negotiation, the start and end dates, and describe in detail the outcome;
- (b) Explain in detail PEC's objectives;
- (c) Explain in detail why PEC believes the outcome was reasonable and the result of prudent action;
- (d) Identify and provide a copy of the contract, if any;
- (e) Identify and provide a copy of all communications (or evidence of communications) with potential supplier; and
- (f) Identify and provide a copy of all internal communications, analyses or memoranda related to the purchase.

NUC-1-3 Referring to PEC's purchasing of fuel and off-system power:

- (a) Please identify and provide all requests for proposals PEC has issued for fuel or purchased power since January 1, 2006.
- (b) Please indicate any objectives or actions that have changed since PEC's last fuel proceeding; and
- (c) Please identify and provide all relevant documents related to subsections (a) through (b).

NUC-1-4 Referring to sales forecasts:

- (a) Please provide PEC's actual and projected kwh sales on a total company and SC jurisdictional basis by customer class for the historical and forecast period.
- (b) Please provide PEC's actual and projected kwh sales by rate schedule for the historical and forecast period.
- (c) Please provide PEC's actual and projected billing demands on a total company and SC jurisdictional basis by customer class for the historical and forecast period.
- (d) Please provide PEC's actual and projected billing demands by rate schedule for the historical and forecast period.
- (e) Please provide all system and South Carolina sales forecasts prepared by PEC since January 1, 2006;
- (f) Please provide all sales forecasts developed or utilized by PEC for purposes of determining historical or forecasted fuel costs and/or fuel factors in NC or SC since January 1, 2006;
- (g) Please provide a detailed narrative explanation as to how PEC has developed or will develop its monthly sales for both the historical and forecast period (for both SC and total system).
- (h) Identify and provide all documents used in preparing the historical and forecast sales numbers and all related documents.

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS**

NUC-1-5 Referring to coal price forecasts:

- (a) Please identify and provide PEC's coal price forecast that it proposes to use in this docket.
- (b) Please provide a detailed narrative explanation how this forecast was developed and how it best represents PEC's expected coal price to be paid during the forecast period. If PEC relies on a forecast by a third party, please identify that party and why PEC relies on their forecast.
- (c) Please explain in detail and provide workpapers and related documents that show how, and to what extent, these forecasts were integrated and/or used in developing projected coal prices used in projecting the fuel costs for the forecast period.
- (d) Please provide a detailed breakdown for each month of the forecast period of the expected cost of coal burned for that month showing the amounts of coal under each contract and the associated price of coal and price of transportation.
- (e) Please further explain all other factors used to develop projected coal prices used in projecting the fuel costs for the forecast period.

NUC-1-6 Referring to natural gas price forecasts:

- (a) Please identify and provide PEC's natural gas price forecast that it proposes to use in this docket.
- (b) Explain and show the relationship between such gas price forecast and NYMEX prices.
- (c) Explain in detail whether PEC uses NYMEX prices to develop its gas price forecast and, if so, what modifications or adjustments are made to these prices and why.
- (d) Please provide a detailed narrative explanation how PEC's natural gas price forecast was developed and how it best represents PEC's expected natural gas price to be paid during the forecast period. If PEC relies on a forecast by a third party, please identify that party and why PEC relies on their forecast.
- (e) Identify the cost of gas delivery, if any, included in PEC's gas price forecasts and explain the basis for such forecasted cost.
- (f) Please explain in detail and provide workpapers and related documents that show how, and to what extent, these forecasts were integrated and/or used in developing projected natural gas prices used in projecting the fuel costs for the forecast period.
- (g) Please provide a detailed breakdown for each month of the forecast period of the expected cost of gas burned for that month showing the amounts of gas and the associated price of gas and price of transportation included in the forecast.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
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- (h) Please further explain all other factors used to develop projected natural gas prices used in projecting the fuel costs for the forecast period.
- NUC-1-7 Please state the total cost of all the firm generation capacity purchases that PEC proposes to include in actual fuel costs in this case. For this total cost figure please state (and identify and provide any calculations and supporting materials):
 - (a) The percentage and amount of cost attributable to fuel;
 - (b) The percentage and amount of cost attributable to transmission charges (explain in detail the basis for inclusion of such charges); and
 - (c) The percentage and amount of cost attributable to other capacity charges (explain in detail the basis for inclusion of such charges).
- NUC-1-8 Please state the total cost of all economy purchases that PEC proposes to include in actual fuel costs in this case. For this total cost figure, please state (and identify and provide any calculations and supporting materials):
 - (a) The percentage and amount of cost attributable to fuel;
 - (b) The percentage and amount of cost attributable to transmission charges; and
 - (c) The percentage and amount of cost attributable to other capacity charges.
- NUC-1-9 Please explain how PEC monitors the capabilities of its current coal suppliers to meet future tonnage and quality requirements. Provide reports of any such evaluations of PEC's coal suppliers which have been made since the beginning of 2006.
- NUC-1-10 Please provide the following information regarding PEC's coal inventory during the historical and/or forecast periods;
 - (a) Copy of studies which recommended the coal inventory levels (days burn, and MMBtus and/or tons) at each coal-fired generating plant for the historical period or which recommend such levels for the forecast period.
 - (b) Amount of target and actual inventory levels during the historical period and recommended for the forecast period.
 - (c) Identify and explain in detail any limits on PEC's ability to increase its coal inventory at its coal-fired generating plants.
 - (d) Explanation for any difference between target and actual inventory level if these differences were large enough to affect PEC's dispatch of the plant or fuel procurement plans;
 - (e) Description of PEC policies and procedures for scheduling coal stockpile surveys and accounting for any resulting discrepancies;

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NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS

- (f) Dates and locations of coal stockpile surveys in historical period;
- (g) Results of historical period coal stockpile surveys in tons over or under, MMBtus over or under, and dollars.

NUC-1-11 Please provide the following information regarding test burns of various types (non-CAPP) coal in PEC's coal-fired generating plants. Provide this information for all test burns conducted since January 1, 2006, and for all earlier test burns which gave results valid for the historical period and/or the forecast period:

- (a) Designation of plant and unit at which PEC conducted the test burn;
- (b) Date and duration of test burn;
- (c) All types of coal and percentages of each which were burned at any one time during the test (e.g., 50% CAPP coal and 50% PRB coal);
- (d) Specific piece of equipment which limited the percentage of non-CAPP coal which could be burned during the test (if such limits were found);
- (e) Description of the problems resulting with that equipment;
- (f) Results and conclusions of the test;
- (g) Summary of follow-up work or follow-up testing which resulted from the test;
- (h) If no test burns have been made at any of PEC's units, explanation of why not.

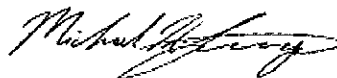
NUC-1-12 Referring to recent increases in coal prices, please provide the following information:

- (a) Explain in detail how PEC believes it reasonably assessed the coal market during the historical period and how it reasonably responded to increasing prices;
- (b) Indicate the market price of coal as perceived by PEC (on NS and CSX separately) for each day (or however frequently such data is available) since July 1, 2007;
- (c) Provide a timeline of new contracts executed or new purchases made during the historical period (for either the historical or the forecast period) including amounts, prices and other relevant characteristics;
- (d) For each new contract or purchase identified in response to (c), please explain why PEC perceived the purchase to be reasonable at the time;
- (e) Identify and provide all documents that support or undercut PEC's answers to (a) and (d) above;
- (f) Identify and provide any analyses of the coal markets or coal purchasing by PEC prepared since July 1, 2007;

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS**

- (g) Identify and provide any plans (or documents referring to such plans) developed by PEC to respond to expected or actual price increases for coal since July 1, 2007; and
 - (h) Identify and provide any comparisons of PEC's coal purchasing with purchasing by neighboring utilities (including any evaluations of how neighboring utilities are conducting coal purchasing activities).
- NUC-1-13 Identify and provide a copy of any documents or materials obtained from coal and gas market and coal and gas procurement seminars or presentations since July 1, 2007.
- NUC-1-14 Refer to the document entitled "PEC Regulated Commercial Operations and Regulated Fuels Risk Management Guidelines" provided by PEC in response to ORS Information Request 1-35. With regard to fuel procurement in the historical and forecast periods, please provide all documents and correspondence related to:
 - (a) commodity risk management strategies in compliance with approved risk management guidelines and company strategies and goals, as referenced in section 4.1;
 - (b) forward curves as referenced in section 5.3, including valuation methodology documentation describing the sources of data and algorithms uses to create each forward curve;
 - (c) pricing models as referenced in section 5.3.1, including reviews and assessments of approved models and model assumptions;
 - (d) stress testing as referenced in section 5.3.2, including scenario and/or stress analysis performed to determine the potential impacts on PEC's risk profile;
 - (e) measurement of market risk as referenced in section 5.5; and
 - (f) risk management reports as referenced in section 5.6.

* * * * *



Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts, & Stone, P.C.
1025 Thomas Jefferson Street, NW
8th Floor West
Washington, DC 20007
(202) 342-0800

**SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
NUCOR'S FIRST SET OF CONTINUING DATA REQUESTS**

Thomas S. Mullikin
Robert R. Smith, II
Moore & Van Allen, PLLC
100 North Tryon Street
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**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2008-1-E

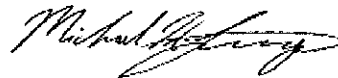
In the Matter of:

)	
)	
Annual Review of Base Rates for Fuel Costs)	Certificate of Service
of Carolina Power & Light Company d/b/a)	
Progress Energy Carolinas, Inc.)	
)	

This is to certify that a copy of the foregoing document, **NUCOR STEEL-SOUTH CAROLINA'S FIRST SET OF CONTINUING DATA REQUESTS TO PEC**, was served upon the following parties at the addresses set forth by first-class mail, electronic mail, telefax, or Federal Express on this the 25th day of April, 2008:

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